

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

ROBERT W. JOINER,

Plaintiff,

v.

EMBRAER AIRCRAFT
MAINTENANCE SERVICES, INC.,

Defendant.

Case No. 3:09-0085

Judge William J. Haynes, Jr.

JURY DEMANDED

OK DEN
Thermonium
is also DENIED
as usual

DEFENDANT'S AMENDED OBJECTIONS TO PLAINTIFF'S DEPOSITION
DESIGNATIONS, ITS COUNTER-DESIGNATIONS, AND ITS
DEPOSITION DESIGNATIONS

Full
128
7-26-11

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(B) and this Court's [Amended] Case Management Order No. 2 (Docket Entry No. 88), Defendant Embraer Aircraft Maintenance Services, Inc. ("EAMS") objects to Plaintiffs' deposition designations and offers its designations and counter-designations as follows:

A. SUSAN WATKINS¹

1. Objections to Testimony of Ms. Watkins

<u>Designated Testimony</u>	<u>Topic</u>	<u>Grounds for Exclusion</u>
9:5 to 13:15 15:6 (starting with "After") to 16:11 30:10 to 31:10 33:5 to 34:20 36:25 to 37:7 37:12 to 37:15	Investigation of complaint about NASCAR email	This testimony goes to the sufficiency of EAMS' investigation. It is not relevant to the determination of whether or not EAMS retaliated against Plaintiff for his complaint. Fed. R. Evid. 401-402. <u>See also</u> Docket Entry Nos. 100-101. The designated testimony also contains

¹ EAMS has listed the witnesses in the same order given on Plaintiff's Trial Witness List (Doc. 57).